

REMARKS

Claims 1-9 are currently pending in the patent application. The Examiner has rejected Claims 1-9 under 35 USC 102 as anticipated by the Robertson patent document. Based on the amendments submitted herewith and the following arguments, Applicants believe that the remaining claims, Claims 1, 3-6, and 8-9 are allowable over the cited art.

The present invention provides a novel apparatus and method for managing mobile agents wherein agent servers maintain not only the history of movements of mobile agents at their locations but also keep a count of the accumulated total of movements by each of the mobile servers for which the agent servers have a history. In addition, the agent servers maintain requests for updating registration server locations and periodically communicate the requests to the registration server, wherein the requests include the history of movements with the accumulated counts. At the registration server, tables are updated for any given mobile agent using only the information that is accompanied by the highest count of accumulated movements, thereby avoiding updating with stale information. Applicants respectfully

assert that the cited art does not teach or suggest the invention as claimed.

The Robertson patent publication is directed to a method and apparatus for implementing a global lookup for global services. Services are counted in the Robertson system. Applicants respectfully assert that the Robertson counting of services, and use of service counts, is not the same as or suggestive of counting the number of accumulated movements of mobile agents. What is taught and claimed by the present invention is agent servers maintaining a history of movements for each of the mobile agents that it encounters and accumulating a count of movements for each of those mobile agents. Clearly the Robertson service count and the claimed movement count are not the same.

The Examiner has cited the Robertson monitoring time duration against the language of Claims 2 and 7. Applicants note that both Claim 2 and Claim 7 have been canceled, while their limitations have been incorporated by amendment into Claims 1 and 6 respectively. Monitoring a time duration for a service is clearly not the same as or suggestive of accumulating a count of movements of a mobile agent.

With regard to Claims 3-4 and 8-9, the Examiner has cited the Robertson teachings relating to a count of the

number of services in a global system. However, the claim language expressly recites comparing a count of accumulated numbers of movements of a mobile agent to a threshold. Counting and comparing numbers of services is clearly not the same as counting and comparing counts of movements.

With regard to Claim 5, the cited Robertson teachings of dispatching rules appear to relate to service load on a global system. Service load does not have anything to do with updating with information containing the higher accumulated number of movements for a given mobile agent.

It is well established under U. S. Patent Law that, for a reference to anticipate claim language under 35 USC 102, that reference must teach each and every claim feature. Since the Robertson publication does not teach maintaining a history of movements for each mobile agents, wherein the history includes a count of the accumulated movements of the mobile agent, and periodically providing requests for updating which include that count information, it cannot be maintained that the Robertson publication anticipates the invention as claimed. Moreover, Robertson does not teach or suggest the claim features of comparing accumulated counts of movements to a threshold or of updating only with information which includes a higher accumulated count.

Accordingly, it cannot be concluded that the Robertson patent publication anticipates the claim language.

Based on the foregoing amendments and remarks, Applicants respectfully request entry of the amendments, reconsideration of the amended claim language in light of the remarks, withdrawal of the rejections, and allowance of the claims.

Respectfully submitted,

Hideki Tai

By: Anne V. Dougherty
Anne Vachon Dougherty
Registration No. 303374
Tel. (914) 962-5910